

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
NASHVILLE, TENNESSEE

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TN PUBLIC UTILITY COMMISSION  
DOCKET OFFICE

IN RE: )  
)  
CHATTANOOGA GAS COMPANY )  
PETITION FOR APPROVAL OF ITS )  
2020 ANNUAL RATE REVIEW )  
FILING PURSUANT TO )  
TENN. CODE ANN. § 65-5-103(d)(6) )  
)

Docket No.

21- 00048

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CGC SCHEDULE 39:  
AFFIDAVIT OF ELIZABETH WADE,  
CHIEF REGULATORY COUNSEL

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I, Elizabeth Wade, being first duly sworn, declare under oath as follows:

1. I have personal knowledge of the information contained in this affidavit and, if called upon to testify in this proceeding, I would competently testify to the matters addressed herein.
2. I am Chief Regulatory Counsel for Southern Company Gas, which is the parent holding company of Chattanooga Gas Company ("CGC" or "the Company"). My business address is 10 Peachtree Place, Atlanta, Georgia 30309.
3. In Docket 20-00047, the Tennessee Public Utility Commission ("Commission") considered CGC's 2019 Annual Review Mechanism ("ARM") recovery. In its order of October

27, 2020, the Commission approved CGC's 2019 ARM as modified by and on the basis of CGC's rebuttal testimony and exhibits and the testimony of the Consumer Advocate that was not inconsistent with CGC's rebuttal testimony and exhibits.

4. As a part of its approval of CGC's 2019 ARM recovery, the Commission also approved a new, additional schedule, designated "Schedule 39: Outside Legal Services," that is to be provided by CGC beginning with its 2021 ARM docket filing. As a part of this new schedule, the Chief Regulatory Counsel of Southern Company Gas shall attest or affirm that each legal invoice paid in the historic base relating to regulatory matters was reviewed and approved under their direction.

5. As the Chief Regulatory Counsel for Southern Company Gas, I am among those responsible for the oversight and coordination of activities of outside counsel involved in regulatory matters, and I review and approve all outside counsel legal invoices for regulatory matters. Without my review and approval, such invoices for outside regulatory attorneys are not paid.

6. The Southern Company Gas legal department utilizes the Thomson Reuters™ Legal Tracker f/k/a Serengeti Tracker, which is an e-billing system that requires outside service providers to submit their bills electronically, subject to our Outside Counsel Guidelines; invoices that are inconsistent with our billing policies are flagged for review. Depending upon the nature of the legal services performed, CGC and Southern Company Gas personnel may be called upon to substantively review invoices before or as a part of my review and approval of invoices. Other Southern Company Gas attorneys review and approve non-regulatory legal invoices.

7. I am knowledgeable of the qualifications and work of the outside regulatory attorneys that work on behalf of CGC. Therefore, I hereby attest that I have personally reviewed

and approved each and every invoice paid in the historic base period for each of the outside law firms performing regulatory work on behalf of CGC that are included in CGC's 2020 ARM recovery in this docket. Based upon my experience and knowledge, I further attest that the approved regulatory invoices are in my opinion reasonable and prudent.

FURTHER AFFIANT SAYETH NAUGHT

*Elizabeth Wade*

Elizabeth B. Wade

SUBSCRIBED and SWORN to before me  
this 19<sup>th</sup> day of April, 2021

*Adrienne Scandrett*

Notary Public

**Adrienne Scandrett**

**Notary Public**

**DeKalb County, State of Georgia**

**My Commission Expires December 21, 2021**